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12 **UNITED STATES BANKRUPTCY COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

15 In Re:

16 Bankr. Case No. 19-30088-DM

17 PG&E CORPORATION and PACIFIC
18 GAS & ELECTRIC COMPANY

19 Debtors

20 Affects PG&E Corporation
21 Affects Pacific Gas & Electric
22 Affects Both Debtors

23 **TROSTLE REPLY IN SUPPORT OF**
24 **ABRAMS MOTION TO FILE**
25 **SUPPLEMENTS TO CLAIMS**
26 **AGAINST PGE**

27 Abrams' motion and PGE's opposition raise the prospect of thousands of claimants
28 filing supplements to claims alleging wrongful manipulation of stock values by PGE in the
years running up to the bankruptcy plan.

29 This prospect is very real. So far, counsel representing about 2,000 claimants have
30 filed formal joinders, with others waiting in the wings. The possibility of filing supplements
31 to claims against PGE is of active concern to thousands of claimants.

32 Once our investigation is complete, we will make an informed decision on the merits
33 whether to file claims supplements. In the meantime, we do not want any ruling on the
34 Abrams' motion to prejudice the rights of other claimants.

1 PGE's opposition ignores two important facts. The first is the value of the stock
2 transferred by PGE to the Trust in mid-2020 was \$2.1 billion short of the \$6.75 billion
3 promised in the Restructuring Support Agreement and the Plan. As a result, no claimant will
4 receive full compensation for their loss.

5 Secondly, PGE has stipulated, and this Court has approved the stipulation, to
6 permit hedge fund Baupost to do exactly what the joining fire victims now propose to do:
7 without the necessity of a motion, permit these claimants to file a supplement to their claims
8 alleging serial misstatements by PGE from 2015 through the confirmation of the Plan that
9 artificially increased the value of the stock in the runup to Plan confirmation, resulting in a
10 dramatic loss of value when the misstatements were publicly exposed. These claimants will
11 then seek damages directly from PGE, not the Trust. As stated in the stipulation, PGE may
12 retain all of its defenses.

13 There is no good reason to deny thousands of claimants the same rights in this regard
14 as Baupost.

15 Otherwise, these joining claimants support Mr. Abrams' motion to have his claim
16 supplement deemed timely by the Court.

17 Dated: March 17, 2023

Nicholas J.P. Wagner

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Attorney for Joining Claimants